

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

JAMES LEIGHTY, ASHLEE LIEGHTY  
and AMANDA HELTON, each  
INDIVIDUALLY, and AS HEIRS TO THE  
ESTATE OF ROBERT EUGENE  
LEIGHTY, DECEASED

Plaintiffs

VS.

STONE TRUCK LINES INC. and  
JARMANJIT SINGH

Defendants

CIVIL ACTION NO. 3:19-cv-2615

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS STONE TRUCK  
LINE, INC. AND JARMANJIT SINGH'S MOTION TO TRANSFER VENUE**

TO THE HONORABLE UNITED STATES MAGISTRATE JUDGE:

NOW COME JAMES LEIGHTY, ASHLEE LIEGHTY and AMANDA HELTON, each INDIVIDUALLY, and AS HEIRS TO THE ESTATE OF ROBERT EUGENE LEIGHTY, DECEASED, Plaintiffs, by and through the undersigned attorneys and file this, their Response in Opposition to Defendants Stone Truck Line, Inc. and Jarmanjit Singh's Motion to Transfer Venue, along with the accompanying Brief in Opposition, and would respectfully show the Court as follows:

**I. THIS CASE SHOULD NOT BE TRANSFERRED TO THE AMARILLO DIVISION**

1. This lawsuit arises from a motor vehicle crash between a motorcycle driven by Plaintiffs' Decedent, and a tractor-trailer owned by Defendant Stone Truck Lines Inc. and driven by Defendant Jarmanjit Singh. Plfs' Orig. Complaint (Doc 1), pp. 2-3, ¶¶ 7-10. The crash occurred December 12, 2019 on Interstate 40 in Wheeler County, Texas. *Id.*, p. 3, ¶9. Wheeler County is in the Northern District of Texas.

2. Contrary to the position taken by Defendants' Stone Truck Line, Inc. and Jarmanjit Singh in their Motion to Transfer Venue (Doc 6) and Brief in Support thereof (Doc 7), the private and public convenience factors do not weigh heavily in favor of transferring this case from the Dallas Division to the Amarillo Division of the Northern District, and such transfer will not be in the interest of justice and for the convenience of the parties and witnesses in this lawsuit. For the reasons identified in Plaintiffs' Brief accompanying this Motion, this Court should deny Defendants' Motion to Transfer Venue the case to the Amarillo Division.

## II. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that Defendants Stone Truck Line, Inc. and Jamanjit Singh's Motion to Transfer Venue be denied, that the Court enter an order denying such Motion and allowing the case to remain in the Dallas Division of the Northern District of Texas, and for such other relief to which Plaintiffs may show themselves justly entitled.

Respectfully submitted,

By: /s/ Reagan Sahadi  
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**ATTORNEY FOR PLAINTIFFS**

## CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of Court through the Court's CM/ECF system, which will send notification of filing to all counsel of record, on this the 16<sup>th</sup> day of December, 2019.

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By: */s/ Reagan Sahadi*  
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